

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

**UNITED STATES OF AMERICA,**

**v.**

**Criminal Case No. 2:20-cr-00054**

**NEDELTCHO VLADIMIROV,**

**Defendant.**

**DEFENDANT NEDELTCHO VLADIMIROV'S JURY VOIR DIRE**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and requests the Court to inquire of the jury panel the following particular areas of interest:

1. Do any of the jurors known any of the witnesses listed or presented by the United States Attorney's Office or the Defendant?
2. Do any of the jurors know the Defendant, Nedeltcho Vladimirov?
3. Has any member of the jury panel ever had a close personal friend or family member who has been charged with a crime?
4. Has any member of the jury panel ever had a close personal friend or family member who has been charged with money laundering, conspiracy, or fraud?
5. Of those person or their close family members or friend who were charged with a crime, was that charge (or charges) ultimately dismissed?
6. Is there anyone on the jury that believes that those charges against either: themselves, close friends, or family members were wrongfully charged?
7. Is there anyone on the jury who does not believe that merely being charged or indicted is proof that person must be guilty of something?

8. Is there anyone on the jury panel who does not believe the basic theory that all people are innocent until proven guilty?

9. Is there anyone on the jury panel who believes at this moment that the Defendant must be guilty of something since he has been charged by the United States?

10. Is there anyone on the jury who without hearing any or all of the evidence, arguments presented by counsel, and the Court's instructions as to the law believe the Defendant is guilt of the crime he has been charged with?

11. Is there anyone on the jury panel who has themselves, or a relation to someone, or knows someone who has been charged with the following: money laundering, wire fraud, mail fraud, transportation of stolen property, conspiracy, fraud, or conspiracy?

12. If the answer to the above question is yes, who has been charged and what was the outcome or disposition of said case?

13. Is there anyone of the jury panel who has ever worked for the Federal Government?

14. Is there anyone on the jury who frequently or routinely listens to police scanners or radios?

15. Is there anyone on the jury panel who currently works or has worked in law enforcement?

16. If the answer to question 15 is yes, then what position, title, job, and agency did you hold while working in law enforcement?

17. Is there anyone on the jury who has a family member or close friend that works or has worked in law enforcement?

18. If the answer to question 17 is yes, then what position or title did the family member or close friend hold while working in law enforcement?

19. Is there anyone on the jury panel who has ever aspired or applied to work with law enforcement?

20. If the answer to question 19 is yes, then what position or job did you aspire or apply to work with the law enforcement field?

21. Is there anyone on the jury panel who is familiar with, professionally or personally, including social networking websites such as Facebook, Myspace, Twitter, Pinterest, or otherwise?

22. Is there anyone on the jury panel who is familiar with eBay, Poshmark, Facebook Yard sale, all online yard sale websites and trading posts?

23. If the answer to question 22 is yes, then in what form have you used the websites?

24. Is there anyone on the jury panel who has read about this case in the newspapers, either online or in print?

25. Is there anyone on the jury panel who has heard or seen anything about this case on the radio, internet, or television?

26. Is there anyone on the jury panel who has personal knowledge about the facts of this case or the Defendant?

27. Is there anyone on the jury panel who feels that they should not sit on this case?

28. If the answer to question 27 is yes, then please specify the reason for feeling that you should not sit on this case.

29. Is there anyone on the jury panel who knows, has worked with, or is acquainted with defense counsel, Timothy J. LaFon, or his law firm Ciccarello, Del Giudice & LaFon?

30. Is there anyone on the jury panel who knows, has worked with, or is acquainted with the US Attorney?

31. Is there anyone on the jury panel who has ever participated as a petit juror in a criminal case or civil case in either federal court or state court?

32. Is there anyone on the jury panel who has ever participated as a grand juror in a criminal case in either federal court or state court? If the answer is yes, please specify the date.

33. Is there anyone on the jury panel who has ever been addicted to drugs or received drug treatment?

34. Is there anyone on the jury panel who has ever had a family member or close friend who is or has been addicted to drugs or received drug treatment?

35. Is there anyone on the jury panel who has issue with immigrants or someone who is currently living in America but is a resident of a foreign country?

36. Is there anyone on the jury panel who has an issue with someone who is originally from a foreign country?

37. Is there anyone on the jury panel who feels that he or she would have issue with following the Court's instructions regarding the law if in disagreement with the instructions?

38. Is there anybody on the jury who doesn't think that everybody should be treated equally by the law?

**NEDELTCHO VLADIMIROV,**

By Counsel.

**/s/ Timothy J. LaFon**

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**CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing “*DEFENDANT NEDELTCHO VLADIMIROV’S JURY VOIR DIRE*” has been electronically filed and service has been made on opposing counsel by virtue of such electronic filing on this \_\_\_\_ day of July, 2021, to:

Andrew Tessman, Esquire  
United States Attorney’s Office  
P.O. Box 1713  
Charleston, West Virginia 25326

**CICCARELLO, DEL GIUDICE & LAFON**

**/s/Timothy J. LaFon**

Timothy J. LaFon, WVSB#2123  
Attorney for Defendant